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ATTORNEY FOR CREDITOR: CONSUMER PORTFOLIO SERVICES

**IN THE BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY (TRENTON)
HONORABLE KATHRYN C. FERGUSON**

In re: : Case No. 18-20286-KCF
: :
NANCY M NALBONE : :
: :
Debtor, : :
: Chapter 13
: :
: Hearing Date: February 27, 2019
: :
-----:

**NOTICE OF MOTION FOR RELIEF FROM STAY
FOR FAILURE TO MAKE PAYMENTS OUTSIDE OF PLAN**

To:

Nancy M Nalbone 33 Miry Brook Road Hamilton, NJ 08690	John Zimnis Law Offices of Peter E. Zimnis 1245 Whitehorse-Mercerville Road Suite 412 Trenton, NJ 08619
Albert Russo Chapter 13 Standing Trustee CN 4853 Trenton, NJ 08650-4853	Office of the United States Trustee One Newark Center Suite 2100 Newark, NJ 07102

PLEASE TAKE NOTICE that Consumer Portfolio Services, Inc., will make a motion on the 27th day of February, 2019 at 09:00 a.m. or as soon thereafter as counsel may be heard before the Honorable Kathryn C. Ferguson sitting at 402 East State Street, Trenton, NJ 08608, Courtroom 2, for an order granting relief from the automatic stay due to debtors' failure to make

regular installment payments outside the Plan as more particularly set forth in the Certification submitted herewith. Costs and counsel fees will also be requested. The property involved is a 2012 Dodge Journey utility 4D SE 2.4L I4, VIN# 3C4PDCAB5CT203784.

TAKE FURTHER NOTICE that if you contest this motion, you must appear in Court on the date noted above AND you are further required to file with the Court and serve on the undersigned a written response no later than seven (7) days prior to the hearing date set forth herein.

BERNSTEIN-BURKLEY, P.C.

/s/ Keri P. Ebeck
Keri P. Ebeck, Esquire (NJ ID No. 262092017)
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STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE WITH
“LOCAL RULES OF BANKRUPTCY PRACTICE” RULE 9013(2)

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth in the accompanying Certification that the Movant has a perfected security interest in the motor vehicle owned by the Debtors, there is no equity in the Vehicle, and there has been a default.

As the facts the Movant relies upon, as set forth in the accompanying Certification and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

Respectfully submitted,
BERNSTEIN-BURKLEY, P.C.

/s/ Keri P. Ebeck
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